

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 0:22-cv-02185-PAM-LIB

Michelle Pohlen,

Plaintiff,

**DEFENDANT’S
MOTION FOR SUMMARY
JUDGMENT**

v.

Alejandro N. Mayorkas,
Secretary, United States Department of
Homeland Security,

Defendant.

Pursuant to Federal Rule of Civil Procedure 56, and with the Court’s permission to bring an early piecemeal motion, Defendant Alejandro N. Mayorkas hereby moves for summary judgment on all remaining claims in this case. This motion addresses only the threshold issue of whether Plaintiff was a “qualified individual” for purposes of the Rehabilitation Act. This motion is based on Defendant’s brief and supporting declarations and exhibits, which will be filed in accordance with the Court’s briefing procedures, as well as on the entire record of proceedings herein.

Respectfully submitted,

Dated: November 28, 2023

ANDREW M. LUGER
United States Attorney

s/ Trevor Brown

BY: TREVOR C. BROWN
Assistant U. S. Attorney
Attorney ID Number 396820
600 U.S. Courthouse

300 South Fourth Street
Minneapolis, MN 55415
(612) 664-5600
trevor.brown@usdoj.gov
Attorneys for Defendant